

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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MARINA BORISOVA,

NOTICE OF MOTION

Plaintiff,

-against-

18 Civ. 7440 (AMD)(SJB)

WILLIAM FRIBERG, TRIPLE I ASSOCIATES, LLC,
P.O. ELIZABETH DROZD-SPIDLE, Shield No. 7902,
P.O. REBECCA COOGAN, Shield No. 3220 and THE
CITY OF NEW YORK,

Defendants.

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PLEASE TAKE NOTICE that, upon the annexed Declaration of Joshua Levin, dated December 20, 2019, the exhibits annexed thereto, the accompanying Memorandum of Law; and upon all prior pleadings and proceedings had herein, Defendants City of New York, and Officers Elizabeth Drozd-Spidle and Rebecca Coogan (hereinafter “City Defendants”) will move this Court before the Honorable Ann M. Donnelly, United States District Judge, at the United States Courthouse for the Eastern District of New York, located at 225 Cadman Plaza East, Brooklyn, New York, 11201, at a date and time to be determined by the Court, for an order to dismiss the Amended Complaint pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, and for such other and further relief as the Court deems just and proper.

PLEASE TAKE NOTICE that, pursuant to Court Order (ECF Text Order dated November 14, 2019), plaintiff's opposition is due by January 20, 2020, and defendants' reply, to the extent one is necessary, is due by February 3, 2020.

Dated: New York, New York
December 20, 2019

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Spidle, and Coogan*
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By: Joshua Levin /s/
Joshua Levin, Esq.

To:
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cc:
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